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December 28, 2023

VIA ECF



Hon. Katherine Polk Failla United States District Judge U. S. District Court for the Southern District of New York 40 Foley Square New York, NY 10007

Re: Chichinadze v. BG Bar Inc. et al. 18-cv-8069 (KPF)

Dear Judge Failla,

We represent Plaintiff Chichinadze in the above-referenced action. We write, on behalf of all Parties, to respectfully request until January 15, 2024 to file copies of the settlement agreement in this matter. The Parties are still in the process of finalizing the settlement agreement and anticipate that the documents will be completed in the next few days. This is the Parties' first request for an extension and all Parties consent.

We thank the Court for its attention to this matter.

Respectfully submitted,

JOSEPH & KIRSCHENBAUM LLP

/s/Josef Nussbaum

D. Maimon Kirschenbaum Josef Nussbaum 32 Broadway, Suite 601 New York, NY 10004 (212) 688-5640

cc: All Counsel of Record (via ECF)

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Application GRANTED. The deadline by which the parties must file copies of the settlement agreement shall be ADJOURNED *nunc pro tunc* to **January 15, 2024**.

The Clerk of the Court is directed to terminate the pending motion at docket number 81.

Dated: December 29, 2023

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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